

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

John Doe, :  
Plaintiff. : Case No. 2:15-cv-02830  
vs. : Judge Gregory L. Frost  
The Ohio State University, et al., : Magistrate Terence P. Kemp  
Defendant. :

**STIPULATED PROTECTIVE ORDER REGARDING DEPOSITION OF NON-PARTY JANE ROE**

Now come the parties and non-party Jane Roe, by and through counsel, and hereby make the following stipulations with respect to Jane Roe's deposition set for January 14, 2016, at 10 a.m. and the subpoena *duces tecum* served upon her by Plaintiff John Doe:

1. Any request for document production to Jane Roe as outlined in the subpoena *duces tecum* directed to and served upon her is suspended pending the production of documents by The Ohio State University. Plaintiff reserves the right to renew the request for production and Jane Roe reserves all objections.
2. With respect to Jane Roe's deposition, the scope of inquiry shall be limited to the investigation, hearing, and other actions taken by The Ohio State University on the allegations that John Doe violated the Code of Student Conduct. This specifically includes:
  - a. Accommodations received by Jane Roe as a result of Jane Roe's allegations

that she was the victim of alleged misconduct by John Doe including, but not limited to, Jane Roe's academic review board proceedings;

- b. Communications with The Ohio State University Office of Student Life and any other employees of The Ohio State University concerning Jane Roe's allegations that she was the victim of alleged misconduct by John Doe.

3. The scope of inquiry at the deposition shall not include:
  - a. The substance of Jane Roe's allegations that she was the victim of alleged misconduct by John Doe, inclusive of all communications regarding the alleged incident unrelated to the investigation, hearing, and other actions taken by The Ohio State University;
  - b. Any medical conditions, prescribed medications, medical treatment or counseling Jane Roe has sought or received as a result of her allegations of misconduct against John Doe, including all communications with any healthcare provider.
4. Jane Roe reserves the right to object to any line of questioning as provided by relevant law.
5. John Doe shall not be permitted to attend the deposition of Jane Roe.

6. The transcript of the deposition of Jane Roe shall be deemed Confidential and may be filed or used by the parties in accordance with the previously issued Protective Order in this case.

IT IS SO STIPULATED.

/s/ Joshua Engel

/s/ Christina Corl

/s/ Reid Caryer

IT IS SO ORDERED.

/s/ GREGORY L. FROST

United States District Judge